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So ordered
10.28.24
Alvin K. Hellerstein

October 24, 2024

VIA ECF & FACSIMILE (212-805-7942)

Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, NY 10007

Re: *Hachette Filipacchi Presse v. Prestige International Group LLC*, Civil Action
No. 1:23-cv-04777-AKH
Letter Requesting Extension of Time to File Default Judgment Motion

Dear Judge Hellerstein:

We represent Plaintiff Hachette Filipacchi Presse ("Plaintiff") in the above-captioned case, and are writing, pursuant to Your Honor's Individual Rule 1(D), to request a further extension of thirty (30) days to file any default judgment motion against Defendant Prestige International Group LLC ("Defendant") (i.e., from October 28, 2024, up to and including November 27, 2024). The parties have executed a settlement agreement among them; however, certain of Defendant's obligations thereunder remain outstanding prior to any dismissal being filed. Therefore, in order to preserve its rights, Plaintiff hereby respectfully submits that a further thirty (30) day extension of its time to file for any default judgment is warranted.

The instant request is Plaintiff's sixth request for any extension; and, as noted herein, all of its prior extension requests have been granted. More specifically, in a letter dated October 5, 2023, Plaintiff initially advised the Court that it would move for a default judgment against Defendant by January 3, 2024. *Dkt. No. 14*. Since Plaintiff's counsel had been corresponding with Defendant in an attempt to resolve the case, Plaintiff requested an extension of time to file for a default judgment until March 1, 2024, which was granted by the Court. *Dkt. Nos. 16-17*. In light of Plaintiff's continued efforts to discuss the case with Defendant, Plaintiff sought a second extension of time to file for a default judgment until April 30, 2024, which was likewise granted by the Court. *Dkt. Nos. 18-19*. Similarly, in an effort to gain contact with Defendant, which had become unresponsive, Plaintiff requested a third extension of time to file for a default judgment until July 29, 2024, which was again granted by the Court. *Dkt. Nos. 20-21*. In light of continued settlement discussions, on or about July 1, 2024, Plaintiff requested a fourth extension of time to file for default judgment until August 28, 2024, which was granted by the Court. *Dkt. Nos. 22-23*. In a letter dated August 23, 2024, Plaintiff advised the Court that an agreement in principle had been reached, but requested a fifth extension of time to file for a default judgment until October 28, 2024, to allow the parties time to execute a written agreement, which was also granted by the

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Court. *Dkt. Nos. 24-25*. Plaintiff also previously filed one adjournment request regarding the initial pretrial conference, which was granted. Since Defendant is in default (*see Dkt. No. 13*) and has not appeared, Plaintiff has not conferred with Defendant regarding this request. No schedule has been entered in this case, and as such, no other deadlines will be impacted by the proposed extension.

We thank the Court for its time and consideration.

Respectfully submitted,

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